

JENNIFER KELLY (CSB No. 193416)
jennifer@tyzlaw.com
RYAN TYZ (CSB No. 234895)
ryan@tyzlaw.com
ERIN JONES (CSB No. 252947)
ejones@tyzlaw.com
DEBORAH HEDLEY (CSB No. 276826)
deborah@tyzlaw.com
CIARA MCHALE (CSB No. 293308)
ciara@tyzlaw.com
SEAN APPLE (CSB No. 305692)
sapple@tyzlaw.com
CHIEH TUNG (CSB No. 318963)
chieh@tyzlaw.com
TYZ LAW GROUP PC
4 Embarcadero Center, 14th Floor
San Francisco, CA 94111
Telephone: 415.868.6900

Attorneys for Plaintiffs
Moonbug Entertainment Limited and
Treasure Studio, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MOONBUG ENTERTAINMENT
LIMITED and TREASURE STUDIO, INC.,

Plaintiffs,

v.

BABYBUS CO., LTD and BABYBUS
(FUJIAN) NETWORK TECHNOLOGY
CO., LTD,

Defendants.

Case No: 3:21-cv-06536-EMC

**EXHIBIT C TO THE DECLARATION
OF DEBORAH HEDLEY IN SUPPORT
OF PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT OF
NONINFRINGEMENT**

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MOONBUG ENTERTAINMENT LIMITED and
TREASURE STUDIO, INC.,

Plaintiffs,

vs.

Case No.
3:21-cv-06536-EMC

BABYBUS CO., LTD and BABYBUS
(FUJIAN) NETWORK TECHNOLOGY
CO., LTD,

Defendant.

REMOTE VIDEOTAPED DEPOSITION

JIACHUN XUE

AUGUST 6, 2022

HIGHLY CONFIDENTIAL

Reported by: Susan S. Klinger, RMR-CRR, CSR

Job No. 213182

Highly Confidential

<div>1</div> <div>2</div> <div>3August 6, 2022</div> <div>45:13 a.m.</div> <div>5</div> <div>6</div> <div>7</div> <div>8Remote Videotaped Deposition of JIACHUN</div> <div>9XUE, held remotely before Susan S. Klinger, a</div> <div>10Registered Merit Reporter and Certified</div> <div>11Realtime Reporter of the State of Texas.</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 2</div>	<div>1A P P E A R A N C E S:</div> <div>2(All appearances via Zoom.)</div> <div>3Attorneys for Plaintiff/Counter-Defendant:</div> <div>4Ryan Tyz, Esq.</div> <div>5Jonathan Downing, Esq.</div> <div>6Tyz Law Group</div> <div>74 Embarcadero Center</div> <div>8San Francisco, CA 94111</div> <div>9</div> <div>10Attorneys for Defendant/Counter-Plaintiff:</div> <div>11Sam Stake, Esq.</div> <div>12Quinn Emanuel Urquhart & Sullivan</div> <div>1350 California Street</div> <div>14San Francisco, CA 94111</div> <div>15</div> <div>16Also Present:</div> <div>17Qiang Ding</div> <div>18Ruochen Huang</div> <div>19Lingling Martin, Mandarin Interpreter</div> <div>20Joey Liu, Mandarin Check Interpreter</div> <div>21Rodolfo Duran, videographer</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 3</div>
<div>1</div> <div>2I N D E X</div> <div>3WITNESSPAGE</div> <div>4JIACHUN XUE</div> <div>5EXAMINATION BY MR. TYZ6</div> <div>6</div> <div>7E X H I B I T S</div> <div>8No. DescriptionPage</div> <div>9Exhibit 23 BB_0000092813</div> <div>10Exhibit 24 BB_0000274534</div> <div>11Exhibit 25 YouTube screenshot54</div> <div>12Exhibit 26 YouTube screenshot55</div> <div>13</div> <div>14Previously marked</div> <div>15Exhibit 3 BB_0000101715</div> <div>16Exhibit 5 BB_00002098-0000210425</div> <div>17Exhibit 6 BB_00002094-0000209731</div> <div>18Exhibit 20 BB_00046093-0004612240</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 4</div>	<div>1P R O C E E D I N G S</div> <div>2VIDEOGRAPHER: Good morning,</div> <div>3counselors. My name is Rodolfo Duran. I</div> <div>4am a legal videographer in association with</div> <div>5TSG Reporting, Inc. Because this is a</div> <div>6remote deposition, I will not be in the</div> <div>7same room with the witness. Instead, I</div> <div>8will record this remotely. The court</div> <div>9reporter, Susan Klinger, also will not be</div> <div>10in the same room and will swear in the</div> <div>11witness remotely.</div> <div>12Do all parties stipulate to the</div> <div>13validity of this video recording and the</div> <div>14swearing in of the witness and that it will</div> <div>15be admissible in the courtroom as if it had</div> <div>16been taken following Rule 30 of the Federal</div> <div>17Rules of Civil Procedures and the state's</div> <div>18rules where this case is pending?</div> <div>19MR. TYZ: Yes, on behalf of</div> <div>20plaintiffs.</div> <div>21MR. STAKE: Yes, on behalf of</div> <div>22BabyBus.</div> <div>23VIDEOGRAPHER: Thank you. This is</div> <div>24the start of media labeled number 1 of the</div> <div>25remote video recorded deposition of Jiachun</div>	<div>Page 5</div>

<p style="text-align: right;">Page 6</p> <p>1 Xue in the matter of MoonBug Entertainment, 2 Limited, et al versus BabyBus (Fujian) 3 Network Technology Company, Limited, August 4 6th, 2022. The time is 5:13 a.m. China 5 standard time and we're on the record. 6 Will counsel please introduce 7 yourselves? 8 MR. TYZ: Ryan Tyz and with me is 9 Jonathan Downing on behalf of plaintiffs 10 MoonBug Entertainment and Treasure Studios. 11 MR. STAKE: Sam Stake on behalf of 12 BabyBus and with me is Mr. Ruochen Huang 13 and Mr. Qiang Ding from BabyBus. 14 VIDEOGRAPHER: Will the court 15 reporter please swear in or affirm the 16 witness and the interpreters. 17 THE WITNESS: Yes, I swear. 18 LINGLING MARTIN AND JOEY LIU, 19 having been first duly sworn interpreted as 20 follows: 21 JIACHUN XUE, 22 having been first duly sworn testified as 23 follows: 24 EXAMINATION 25 BY MR. TYZ:</p>	<p style="text-align: right;">Page 7</p> <p>1 Q. Good morning. My name is Ryan Tyz. 2 I'm counsel for MoonBug in this matter. Today 3 I'm going to ask you some questions. 4 A. Okay, I understand. 5 Q. What is your name? 6 A. My name is Xue Jiachun, 7 J-i-a-c-h-u-n, last name X-u-e. 8 Q. So before we get started I'm going 9 to go over a couple of instructions. The first 10 is if you answer one of my questions, I will 11 assume you understood it. If you don't -- 12 don't understand one of my questions, please 13 let me know. 14 A. Okay, I understand. 15 Q. And are you in a room by yourself 16 right now? 17 A. Yes, only me. 18 Q. And do you have any documents or 19 notes in front of you? 20 A. No. 21 Q. Do you have any chat functions on 22 your computer open right now? 23 A. No. 24 Q. And do you understand that you have 25 to be truthful today?</p>
<p style="text-align: right;">Page 8</p> <p>1 A. Yes. 2 Q. Where do you live? 3 A. I live in Hsinbei City, Taiwan. 4 INTERPRETER: Interpreter spelling, 5 H-s-i-n-b-e-i. 6 Q. And where do you work? 7 A. I work at the Taiwan branch of 8 BabyBus. 9 Q. And when did you start working for 10 BabyBus? 11 A. Roughly in 2018. 12 Q. And what was your position in 2018 13 when you started at BabyBus? 14 A. My position at the time was product 15 planning. 16 Q. And you were part of the product 17 planning team at BabyBus for Super JoJo; right? 18 A. That's correct, I was one of the 19 planners for the JoJo project. 20 Q. And you were one of the planners for 21 the JoJo project from the beginning of that 22 project; correct? 23 A. Correct, I was already a member of 24 the team when the project was initiated. 25 Q. And when was the project, Super JoJo</p>	<p style="text-align: right;">Page 9</p> <p>1 project initiated at BabyBus? 2 A. Roughly in 2019, 2018, the end of 3 2018 or 2019. 4 Q. And who was your boss at BabyBus at 5 the time of the initiation of the Super JoJo 6 project? 7 A. At that time the team lead for the 8 JoJo project was Xiangyin Lin, X-i-a-n-g-y-i-n, 9 last name L-i-n. 10 Q. And as the planner for Super JoJo, 11 did you watch CoComelon videos? 12 A. At the initiation of any project we 13 would -- would always try to collect as much 14 information about any competitive products. So 15 we would not only look at CoComelon's videos 16 but we would also look at many others such as 17 the Pinkfong, F-o-n-g from Korea, LooLoo Kids 18 and Super Simple Song. 19 MR. TYZ: I'm going to object as 20 nonresponsive. 21 Q. It is important that you just listen 22 to my question and answer just the question 23 that I was asking. Your counsel, Mr. Stake, at 24 the end of this deposition if he needs 25 clarification or wants to ask you different</p>

<p style="text-align: right;">Page 38</p> <p>1 Q. JoJo is the main character of the</p> <p>2 JoJo show; right?</p> <p>3 A. Correct.</p> <p>4 Q. And JoJo is intended to be a baby of</p> <p>5 a year and a half; correct?</p> <p>6 A. The actual age of JoJo, I do not</p> <p>7 really remember that. I need to go back and</p> <p>8 look at the original documents.</p> <p>9 Q. What original documents are you</p> <p>10 referring to?</p> <p>11 A. There would be some documents that</p> <p>12 designs the characters or the rows. For</p> <p>13 example, what will be the mother's name, what</p> <p>14 will be the name of the baby, and what age.</p> <p>15 Q. And the main character JoJo he</p> <p>16 walks; right?</p> <p>17 A. Yes, he can walk.</p> <p>18 Q. And he does walk in some of the</p> <p>19 videos; right?</p> <p>20 A. Yes.</p> <p>21 Q. And JoJo dances?</p> <p>22 A. Towards the later series, yes, he</p> <p>23 did.</p> <p>24 Q. And JoJo sings?</p> <p>25 A. JoJo was modeled after a real kid,</p>	<p style="text-align: right;">Page 39</p> <p>1 so whatever a real kid could do, JoJo pretty</p> <p>2 much could do.</p> <p>3 MR. TYZ: I want to object as</p> <p>4 nonresponsive.</p> <p>5 Q. Does JoJo sing?</p> <p>6 A. If there was a episode that was</p> <p>7 planned for him to do that -- excuse me, let me</p> <p>8 do it again.</p> <p>9 If a project -- if we had -- if we</p> <p>10 had a project that includes -- included him</p> <p>11 dancing, then I would think so.</p> <p>12 Q. My question was about singing.</p> <p>13 There are videos in which JoJo sings along;</p> <p>14 correct?</p> <p>15 A. If you are talking about in the</p> <p>16 music whether there is any singing rows or any</p> <p>17 conversation, I believe he sometimes sings.</p> <p>18 Q. And JoJo has a supporting cast of</p> <p>19 characters; correct?</p> <p>20 A. Yes.</p> <p>21 Q. He has a mother and father; correct?</p> <p>22 A. Yes.</p> <p>23 Q. He has an older brother and older</p> <p>24 sister; correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 40</p> <p>1 Q. And he has a pet dog?</p> <p>2 A. Yes.</p> <p>3 Q. Named Bingo?</p> <p>4 A. Yes.</p> <p>5 Q. Just like JJ of CoComelon?</p> <p>6 A. Bingo, the name Bingo was used was</p> <p>7 because there was an English song called Bingo.</p> <p>8 MR. TYZ: Object as nonresponsive.</p> <p>9 MR. STAKE: Opposed.</p> <p>10 Q. JoJo has a pet dog named Bingo;</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. And JJ of CoComelon has a pet dog</p> <p>14 named Bingo; correct?</p> <p>15 A. I am not sure or I don't know the</p> <p>16 real name of the dog in CoComelon.</p> <p>17 Q. Okay. I've put in front of you what</p> <p>18 has been previously marked as Exhibit 20.</p> <p>19 (Exhibit 20 discussed.)</p> <p>20 A. Okay. It is open.</p> <p>21 Q. So this, again, has a translation in</p> <p>22 the Chinese version of Exhibit 20 begins page</p> <p>23 32, yes.</p> <p>24 A. Okay, thank you, okay.</p> <p>25 Q. What is Exhibit 20?</p>	<p style="text-align: right;">Page 41</p> <p>1 A. It looks like a PowerPoint.</p> <p>2 Q. And it is a PowerPoint titled Young</p> <p>3 Children's Channel that was prepared by your</p> <p>4 boss at the time, Ms. Lin; correct?</p> <p>5 MR. STAKE: Objection to form.</p> <p>6 A. Correct, I believe so.</p> <p>7 Q. And you have seen Exhibit 20 before;</p> <p>8 right?</p> <p>9 A. She did a presentation at one point.</p> <p>10 Q. Of Exhibit 20 in which you attended;</p> <p>11 right?</p> <p>12 A. Yes, I participated in that brief</p> <p>13 meeting, briefing -- sorry let me say again.</p> <p>14 Yes, I participated in that</p> <p>15 briefing.</p> <p>16 Q. In that briefing, Exhibit 20 was</p> <p>17 presented to the people in attendance; correct?</p> <p>18 A. Correct, that is correct according</p> <p>19 to my -- according to my recollection.</p> <p>20 Q. And it has a -- it says 2019 and</p> <p>21 then Planning Group B video business</p> <p>22 department. Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. And you were a planner within</p> <p>25 Planning Group B at that time; correct?</p>

Page 42

1 A. That's correct.
 2 Q. And this was the presentation of
 3 initiating the Super JoJo show; correct?
 4 A. Because it has been a while, I would
 5 think so, by looking at the content of this
 6 document.
 7 Q. If you go to page 34 of Exhibit 20,
 8 please.
 9 A. Okay, core concept. Over here?
 10 Q. Is it page 34?
 11 A. It says Super JoJo; correct?
 12 Q. Yes, under channel settings?
 13 A. Correct.
 14 Q. And what does it say under Super
 15 JoJo?
 16 A. Specialized -- a specific channel
 17 created -- custom created for babies age 1 to
 18 2.
 19 CHECK INTERPRETER: Correction.
 20 A. Oh, for babies ages 1 to 2 and a
 21 half.
 22 INTERPRETER: Thank you.
 23 Q. And if you go to page 37 of Exhibit
 24 20. What is -- what is depicted or presented
 25 on page 37 of Exhibit 20?

Page 44

1 -- for something that is above his age or
 2 sometimes do something a little more for the
 3 things -- the lowest age based on the needs of
 4 the story. I believe that was indicated
 5 somewhere before.
 6 Q. What do you mean JoJo would do
 7 something a little more or above his age?
 8 MR. STAKE: Objection to form.
 9 A. For example, later in the later
 10 videos it showed some of the rhythmic movement
 11 done by the babies, however, those type of
 12 movement, rhythmic movement would be the
 13 ability of somebody who would be older than 1
 14 and a half year old.
 15 However, in order for the video to
 16 look more beautiful or to look better we made
 17 the baby to be able to do those rhythmic
 18 movement. That is why what I said sometimes
 19 the baby would do things that would exceed the
 20 age range that was set for him.
 21 Q. Let me see if I understand. So JoJo
 22 was set at the age of an inquisitive 1 and a
 23 half year old, but in the videos he could do
 24 things that were of a baby that was older than
 25 1 and a half; is that right?

Page 43


1 A. Content setting, multi-language
 2 channels, IP content.
 3 Q. What does IP mean?
 4 A. IP means the characters.
 5 Q. And the IP for Super JoJo is a small
 6 family including a baby, father, mother,
 7 brother, sister and a pet dog?
 8 A. Correct, according to what is
 9 written here, that's correct.
 10 Q. And as a member of the planning
 11 team, did you understand this was the plan for
 12 the Super JoJo show?
 13 A. I believe this is a overall basic
 14 setting for the show.
 15 Q. If you go to page 40 of Exhibit 20.
 16 A. Okay, I'm there.
 17 Q. And this is the IP settings and then
 18 it has JoJo. It says, main character 1.5 year
 19 old inquisitive baby. Do you see that?
 20 A. Yes, yes, I see it.
 21 Q. So is it your understanding that the
 22 plan was for JoJo to be a year and a half old
 23 character?
 24 A. I seem to remember that the baby
 25 sometimes would do something a little more for

Page 45

1 MR. STAKE: Objection, form.
 2 A. If at the initiation of the project
 3 when people conducted discussion and decided
 4 that for that particular episode the baby would
 5 do something a little more mature, and people
 6 agree, then it would do that.
 7 Q. Would you agree that in the planning
 8 document it says that the IP setting for the
 9 character JoJo is intended to be a 1 and a half
 10 year old inquisitive baby and that's indicated
 11 on slide 40 of Exhibit 20; correct?
 12 MR. STAKE: Objection to form.
 13 A. If you are just talking about this
 14 particular document, yes, it says 1 and a half
 15 baby, that's correct. 1 and a half year old
 16 baby, yes, that's correct.
 17 Q. And then you just testified that in
 18 some of the videos for Super JoJo, he did
 19 things that were more mature than a 1 and a
 20 half year old inquisitive baby; is that right?
 21 A. Correct.
 22 Q. For example, he sings in English in
 23 some videos?
 24 A. If you are -- if you are talking
 25 about the simple English, yes, he would be able

<p style="text-align: right;">Page 54</p> <p>1 MR. STAKE: We have been going for</p> <p>2 about another hour.</p> <p>3 MR. TYZ: I have probably about 10</p> <p>4 minutes left, Sam, if you let me finish up.</p> <p>5 MR. STAKE: I will allow it if that</p> <p>6 is okay with our court reporter and our</p> <p>7 translator.</p> <p>8 INTERPRETER: I'm fine, thank you.</p> <p>9 Q. Putting up what has been marked as</p> <p>10 Exhibit 25.</p> <p>11 (Exhibit 25 marked.)</p> <p>12 A. Okay, I see it.</p> <p>13 Q. What is Exhibit 25?</p> <p>14 A. This is the Way.</p> <p>15 Q. And this is CoComelon's video?</p> <p>16 A. Correct.</p> <p>17 Q. And it is dated January 15th, 2019?</p> <p>18 A. Correct.</p> <p>19 Q. And it has 560 million views over?</p> <p>20 A. I'm not sure what -- what that</p> <p>21 number of views is at what time. I'm not sure</p> <p>22 about when --</p> <p>23 MR. TYZ: Is that just me?</p> <p>24 COURT REPORTER: No, she is frozen.</p> <p>25 MR. TYZ: I guess we're going to</p>	<p style="text-align: right;">Page 55</p> <p>1 take that break after all.</p> <p>2 VIDEOGRAPHER: Time is 7:52 and</p> <p>3 we're going off the record.</p> <p>4 (Recess, 7:52 to 7:53 p.m.)</p> <p>5 VIDEOGRAPHER: The time is 7:53 and</p> <p>6 we're back on the record.</p> <p>7 A. I am not sure about these numbers in</p> <p>8 terms of the number of views, because I don't</p> <p>9 know when the screen capture was made.</p> <p>10 Q. Fair enough. But you look at the --</p> <p>11 the URL at the very top and that is the</p> <p>12 internet address. Can you compare that</p> <p>13 internet address to the link that is on slide 4</p> <p>14 D8 of Exhibit 20, please and -- correction,</p> <p>15 page 49 of Exhibit 20?</p> <p>16 A. Okay.</p> <p>17 Q. So you see that the first link on</p> <p>18 page 49 of Exhibit 20, which is the BabyBus</p> <p>19 planning document for the JoJo show refers to</p> <p>20 This is the Way video by CoComelon?</p> <p>21 A. Yes. I compared the links and they</p> <p>22 are the same links.</p> <p>23 Q. I will put in what has been marked</p> <p>24 as Exhibit 26.</p> <p>25 (Exhibit 26 marked.)</p>
<p style="text-align: right;">Page 56</p> <p>1 Q. And Exhibit 26 is another internet</p> <p>2 printout this time of Yes Yes Vegetable Song by</p> <p>3 CoComelon. Do you see that?</p> <p>4 A. Give me a second. Yes, I see it.</p> <p>5 Q. Do you see that internet address</p> <p>6 matches the second link on page 49 of Exhibit</p> <p>7 20, which is the planning document of BabyBus</p> <p>8 for Super JoJo?</p> <p>9 A. Yes, yes, they are the same.</p> <p>10 Q. So if you look back at Exhibit 20</p> <p>11 under the product specification pages that</p> <p>12 range between page 46 and 50, the only pictures</p> <p>13 of characters over those pages are of the</p> <p>14 CoComelon's baby JJ character; correct?</p> <p>15 A. I also saw JoJo on the IP</p> <p>16 presentation earlier on.</p> <p>17 MR. TYZ: Object to nonresponsive.</p> <p>18 Q. I'm just talking about the</p> <p>19 production specifications for the JoJo show in</p> <p>20 Exhibit 20, which is pages 46 through 50. The</p> <p>21 only images of a character are of CoComelon's</p> <p>22 JJ character; correct?</p> <p>23 A. If you are talking about those</p> <p>24 screenshots for references, yes, what I saw are</p> <p>25 only JJ from CoComelon.</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. And there are no references to the</p> <p>2 content of any other competitor of BabyBus in</p> <p>3 Exhibit 20, is there?</p> <p>4 MR. STAKE: Objection, form.</p> <p>5 A. I believe that the -- the planning</p> <p>6 document wanted to have -- to create a look and</p> <p>7 feel similar to CoComelon's. I'm not sure</p> <p>8 about the other competitors products whether</p> <p>9 they had the same look and feel, but maybe that</p> <p>10 is why it wasn't mentioned in there.</p> <p>11 MR. TYZ: I have no further</p> <p>12 questions at this time. Subject to later</p> <p>13 given the issue of communications, but that</p> <p>14 is all I have, Sam.</p> <p>15 MR. STAKE: I would just like to</p> <p>16 designate this transcript as Highly</p> <p>17 Confidential under the protective order in</p> <p>18 this case.</p> <p>19 MR. TYZ: Thank you very much for</p> <p>20 your time and I like your little kitten.</p> <p>21 VIDEOGRAPHER: The time is 8:01 and</p> <p>22 we're going off the record.</p> <p>23 (Deposition adjourned at 8:01 a.m.)</p> <p>24</p> <p>25</p>

Highly Confidential

<div style="text-align: right;">Page 58</div> <p style="text-align: center;">J U R A T</p> <p>I, _____, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on _____; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.</p> <p>DATED this ____ day of _____, 2022, at _____.</p> <p>_____ SIGNATURE OF WITNESS</p>	<div style="text-align: right;">Page 59</div> <p style="text-align: center;">C E R T I F I C A T E</p> <p>I, SUSAN S. KLINGER, a certified shorthand reporter within and for the State of Texas, do hereby certify:</p> <p>That JIACHUN XUE, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.</p> <p>I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.</p> <p>IN WITNESS WHEREOF, I have hereunto set my hand this 17th of August, 2022.</p> <p style="text-align: center;">  Susan S. Klinger, RMR-CRR, CSR Texas CSR# 6531 </p>																																																																											
<div style="text-align: right;">Page 60</div> <p style="text-align: center;">E R R A T A S H E E T</p> <p>Case Name: _____</p> <p>Deposition Date: _____</p> <p>Deponent: _____</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pg.</th> <th>No.</th> <th>Now Reads</th> <th>Should Read</th> <th>Reason</th> </tr> </thead> <tbody> <tr><td>6</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>7</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>8</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>9</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>10</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>11</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>12</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>13</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>14</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>15</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>16</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>17</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>18</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>19</td><td>___</td><td>_____</td><td>_____</td><td>_____</td></tr> </tbody> </table> <p>_____ Signature of Deponent</p> <p>SUBSCRIBED AND SWORN BEFORE ME</p> <p>THIS ____ DAY OF _____, 2022.</p> <p>_____ (Notary Public) MY COMMISSION EXPIRES: _____</p>	Pg.	No.	Now Reads	Should Read	Reason	6	___	_____	_____	_____	7	___	_____	_____	_____	8	___	_____	_____	_____	9	___	_____	_____	_____	10	___	_____	_____	_____	11	___	_____	_____	_____	12	___	_____	_____	_____	13	___	_____	_____	_____	14	___	_____	_____	_____	15	___	_____	_____	_____	16	___	_____	_____	_____	17	___	_____	_____	_____	18	___	_____	_____	_____	19	___	_____	_____	_____	
Pg.	No.	Now Reads	Should Read	Reason																																																																								
6	___	_____	_____	_____																																																																								
7	___	_____	_____	_____																																																																								
8	___	_____	_____	_____																																																																								
9	___	_____	_____	_____																																																																								
10	___	_____	_____	_____																																																																								
11	___	_____	_____	_____																																																																								
12	___	_____	_____	_____																																																																								
13	___	_____	_____	_____																																																																								
14	___	_____	_____	_____																																																																								
15	___	_____	_____	_____																																																																								
16	___	_____	_____	_____																																																																								
17	___	_____	_____	_____																																																																								
18	___	_____	_____	_____																																																																								
19	___	_____	_____	_____																																																																								